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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS (BEAUMONT DIVISION)

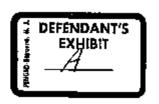
JAMIE LEIGH JONES and JOSEPH con con con con con DAIGLE Plaintiffs, CIVIL ACTION NO. 1:07-ev-295 VS. HALLIBURTON COMPANY d/b/a 8 KBR KELLOGG BROWN & ROOT (KBR); KELLOGG BROWN & ROOT SERVICES, INC.; KELLOGG BROWN & ROOT INTERNATIONAL, § INC.; KELLOGG BROWN & ROOT, § LLC; KELLOGG BROWN & ROOT, INC.; KELLOGG BROWN & ROOT, S. de R.L.; KELLOGG BROWN & ROOT (KBR), INC.; KBR TECHNICAL SERVICES, INC.; OVERSEAS ADMINISTRATIVE SERVICES, LTD.; ERIC ILER, CHARLES BOARTZ; SEVERAL JOHN DOE RAPISTS, and THE UNITED STATES OF AMERICA Defendants.

PLAINTIFFS' FIRST REQUESTS FOR ADMISSION TO HALLIBURTON COMPANY d/b/a KBR KELLOG BROWN & ROOT (KBR)

Plaintiffs Jamie Leigh Jones and Joseph Daigle, serve these Requests for Admission upon Defendant, Halliburton Company d/b/a KBR Kellog Brown & Root (KBR). Pursuant to FED. R. Civ. Pro., Defendant is required to Admit or Deny each and every Request, under oath, within 30 days after service.

A. Instructions

For any request that cannot be admitted, state fully the reasons therefore, and admit as much of the Request as is admitted, and state any and all objections and or privileges which you believe relieve you of the responsibility to Admit or Deny, pursuant to FED. R. Civ. Pao.



REQUEST 83: Admit that Halliburton/KBR employees entered Jamie's room after

she reported the rape and prior to the U.S. State Departments'

involvement in the investigation.

RESPONSE:

Admit that Halliburton/KBR employees removed evidence from REQUEST 84:

Jamie's room after she reported the rape and prior to the U.S. State

Departments' involvement in the investigation.

RESPONSE:

Admit that Halliburton/KBR implemented a "no alcohol" policy <u>REQUEST 85:</u>

after the report of rape by Jamie.

RESPONSE:

Admit that the Hall burton/KBR barracks in which Jamie lived at REQUEST 86:

the time of the incident in question were predominantly male

quarters.

RESPONSE:

Admit that Halliburton/KBR did not discipline Charles Boartz, or REQUEST 87:

any of the other males present in Jamie's room on the evening of

these events.

RESPONSE:

Admit that Halliburton/KBR has never disciplined a male REQUEST 88:

employee for acts of alleged sexual abuse or rape following

complaints of such acts by female employees in Camp Hope.

<u>RESPONSE:</u>

Respectfully submitted,

<u>/s/ L. Todd Kelly </u>

L. Todd Kelly

THE KELLY LAW FIRM, P.C.

Texas Bar No. 24035049 One Riverway, Suite 1150.

Houston, Texas 77056

Tel. (713) 255-2055

Fax. (713) 523-5939

Paul Waldner
VICKERY, WALDNER & MALLIA, L.L.C.
Texas Bar No. 20679800
One Riverway, Suite 1150
Houston, Texas 77056
Tel. (713) 526-1100
Fax. (713) 523-5939

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Stephanie M. Morris ATTORNEY AT LAW Member of D.C. and PA. Bars 1660 L. Street, N.W., Suite 506 Washington, D.C. 20036 Tel. (202) 536-3353 Fax. (202) 463-6328

ATTORNEYS FOR PLAINTIFF, JAMIE JONES AND JOSEPH DAIGLE



CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record were served with true and correct copies of the attached First Requests for Admission on this 5^{th} day of June, 2007:

Shadow Sloan, Esq.
VINSON & ELKINS, LLP
First City Tower
1001 Fannin Street, Suite 2300
Houston, Texas 77002-6760

/s/ L. Todd Kelly